

JP:UAD

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 49, U.S.C., § 46504)

KIM GOODWINE,  
also known as  
"Kim Langston,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Michael J. Lewis, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about April 18, 2010, the defendant KIM GOODWINE, also known as "Kim Langston," while being an individual on an aircraft in the special aircraft jurisdiction of the United States, did knowingly and intentionally assault and intimidate a flight crew member and flight attendant of the aircraft, interfere with the performance of the duties of the flight crew member and flight attendant, and lessen the ability of the flight crew member and flight attendant to perform those duties.

(Title 49, United States Code, Section 46504.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On April 18, 2010, your deponent was notified that there had been a disturbance on Delta Airlines Flight 1788 as it flew from Atlanta, Georgia to LaGuardia Airport ("LaGuardia") in Queens, New York.

2. All of the following information was relayed to your deponent by passengers and members of the flight crew who were aboard Flight 1788 and fellow law enforcement officers. This information was relayed after the defendant, KIM GOODWINE, also known as "Kim Langston," was arrested and advised of her Miranda rights.

3. The defendant, KIM GOODWINE, boarded Flight 1788 heavily intoxicated. She proceeded to sit in an aisle seat purchased by another passenger and fell asleep. The purchaser of the aisle seat, a pregnant woman, asked for assistance from the flight crew to have the defendant KIM GOODWINE move to her proper seat, which was the middle seat in that row. Upon being asked to move, the defendant became verbally belligerent toward this passenger and the flight crew. The defendant did, however, proceed to move to her seat.

4. When the aircraft was in flight, the defendant, KIM GOODWINE, began once again shouting and yelling obscenities and racial epithets at the pregnant passenger and the flight crew.

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

The pregnant passenger began crying. At this point, a member of the flight crew approached another passenger on board the flight, who the crew member knew was an FBI agent ("the agent"), and asked for assistance. The flight crew moved the pregnant passenger to another seat, and the agent sat down next to the defendant. The flight crew told the defendant that the man sitting next to her was a law enforcement officer, and the agent identified himself as an FBI agent to the defendant.

5. The defendant, KIM GOODWINE, took out her camera and began videotaping. The FBI agent attempted to calm the defendant down and also asked her to put away her device. The defendant became increasingly belligerently and continued to yell obscenities at the flight crew and the agent.

6. A flight attendant approached the agent and informed him that the defendant, KIM GOODWINE, would be placed under arrest upon arrival at LaGuardia.

7. At this point, the agent asked the defendant, KIM GOODWINE, to follow him to the back of the plane. When she refused and continued to act aggressively, he proceeded to put handcuffs on her. In response, the defendant began kicking and pushing the agent.

8. The defendant KIM GOODWINE continued to act belligerently even after being placed in handcuffs. As the agent escorted her to the back of the place, the defendant bit both of the agent's hands, drawing blood.

9. Your deponent met the flight upon landing at LaGuardia and placed the defendant under arrest.

10. It is your deponent's understanding that the plane in question is a "civil aircraft of the United States," pursuant to 49 U.S.C. § 46501(2)(a), in that it is registered by Delta Airlines under Chapter 441 of Title 49. See 49 U.S.C. § 40102(a)(17). It is further your deponent's understanding that the plane in question was "in flight," as defined in 46 U.S.C. § 46501(1) during the events described herein.

WHEREFORE, your deponent respectfully requests that defendant KIM GOODWINE, also known as "Kim Langston" be dealt with according to law.

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Michael J. Lewis  
Federal Bureau of Investigation

Sworn to before me this  
19th day of April, 2010

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United States Magistrate Judge  
Eastern District of New York